

EXHIBIT 10

From: Knudson, Jacquelyn Swanner
Sent: Tuesday, December 22, 2020 11:47 AM
To: Robert Drain
Cc: NYSBml_Drain's_Chambers; McClammy, James I.; Huebner, Marshall S.; Oluwole, Chautney M.; Townes, Esther C.; sbickford@mbfirm.com; srd@mbfirm.com; usdcndoh@mbfirm.com; donald@creadorelawfirm.com; khr@khrlawoffices.com; Rocco A. Cavaliere; Scott Markowitz; Michael Z. Brownstein; srb@mbfirm.com
Subject: RE: [EXT] RE: In re Purdue Pharma L.P., Case No. 19-23649 (RDD) - Debtors' Objection to the NAS Children Ad Hoc Committee's Motion to Seal

To The Honorable Robert D. Drain,

The Debtors and counsel for the NAS Children Ad Hoc Committee (the “NAS Committee”) had a productive meet and confer yesterday. We have agreed to the following path forward with respect to the underlying Rule 2004 Motion: the NAS Committee will coordinate with the Official Committee of Unsecured Creditors (the “UCC”) to run targeted search terms on the UCC and Sackler Families databases over the next few days. The Debtors will confirm with the UCC that any documents that hit on the NAS Committee’s targeted searches can be made available to NAS Committee counsel. Through this process, the NAS Committee may find that it is unlikely that there are any additional animal studies in the Debtors’ possession. If, however, the NAS Committee finds information suggesting additional searches might be needed, the Debtors agree to discuss additional searches with the NAS Committee and cooperate with any additional searches that the Debtors and NAS Committee agree are warranted.

Regarding your question concerning the NAS Committee’s pending Motion to Seal—whether there is any objection to the Motion to Seal before the Rule 2004 Motion is filed and a hearing is scheduled on it—the Debtors do not have an objection to the Motion to Seal. The Debtors objection is to the underlying Rule 2004 Motion. Given the outcome of the meet and confer with respect to the Rule 2004 Motion, the parties propose that any hearing on the Rule 2004 Motion await our further meet and confer after the search terms have been run on the UCC and Sackler Families productions, as that may narrow the issues presented to the Court.

Respectfully submitted,
Jacquelyn Knudson

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From: Scott Markowitz <SMarkowitz@tarterkrinsky.com>
Sent: Monday, December 21, 2020 2:36 PM
To: Robert Drain <judge_drain@nysb.uscourts.gov>
Cc: Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; NYSBml_Drain's_Chambers <rdd.chambers@nysb.uscourts.gov>; McClammy, James I. <james.mcclammy@davispolk.com>; Huebner, Marshall S.

<marshall.huebner@davispolk.com>; Townes, Esther C. <esther.townes@davispolk.com>; sbickford@mbfirm.com; srd@mbfirm.com; usdcndoh@mbfirm.com; donald@creadorelawfirm.com; khr@khrlawoffices.com; Rocco A. Cavaliere <rcavaliere@tarterkrinsky.com>

Subject: Re: [EXT] RE: In re Purdue Pharma L.P., Case No. 19-23649 (RDD) - Debtors' Objection to the NAS Children Ad Hoc Committee's Motion to Seal

Thank you judge Drain . We have a call set for today at 4 pm with Debtors' counsel . We will advise you after that call .



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On Dec 21, 2020, at 2:32 PM, Robert Drain <judge_drain@nysb.uscourts.gov> wrote:

There are two motions by the NAS Babies Ad Hoc Committee before me: a motion under Bankruptcy Rule 2004 for the production of certain documents and a motion to file the foregoing motion under seal and for permission to file a redacted version of the Rule 2004 motion on the docket. The Debtor's response to the latter, sealing motion is really a response to the former, Rule 2004 motion. If there is an objection to a Rule 2004 motion, I would normally have it scheduled for a hearing. But please confirm whether there is any objection to the motion to seal before the Rule 2004 motion is filed and a hearing is scheduled on it. Alternatively, if the parties want to discuss this in a chambers conference, I'm happy to do that, too. In preparation for such a conference, or for a hearing, you should know that it seems to me that one of the debtors' objections should be focused on, i.e. that the debtors don't have the documents in question in their possession, custody or control. If that were clearly the case, then the 2004 motion isn't going anywhere. However, the debtors also argue that it would be unduly burdensome to search for the documents in question, notwithstanding that the parties seem to have identified those documents perhaps narrowly enough for a focused search; so why can't such a focused search be undertaken?

From: Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>

Sent: Friday, December 18, 2020 4:38 PM

To: NYSBml_Drain's_Chambers <rdd.chambers@nysb.uscourts.gov>

Cc: McClammy, James I. <james.mcclammy@davispolk.com>; Huebner, Marshall S.

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Rocco A. Cavaliere <rcavaliere@tarterkrinsky.com>

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CAUTION - EXTERNAL:

To The Honorable Robert D. Drain,

We are counsel to Purdue Pharma L.P. and the other debtors and debtors in possession (collectively, the "Debtors") in the chapter 11 proceedings jointly administered under Case No. 19-23649.

Pursuant to your request, please find attached a copy of the Debtors' Objection to the NAS Children Ad Hoc Committee's Motion for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a) and 107(b) and Fed. R. Bankr. P. 9018 Authorizing the Filing of Certain Information and Exhibits Under Seal in Connection with the NAS Children Ad Hoc Committee's Ex Parte Motion Requesting a Court Order Authorizing Examinations Pursuant to Federal Rules of Bankruptcy Procedure 2004 and 9006 [ECF No. 2155] (the "Objection").

If Chambers has any questions regarding the Objection or requires any additional information, please contact Jim McClammy at: james.mcclammy@davispolk.com, or 347-260-3092.

Respectfully submitted,
Jacquelyn Knudson

Jacquelyn Swanner Knudson

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